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**From:** Kalandiyur, Nesamani@ARB [nesamani.kalandiyur@arb.ca.gov]  
**Sent:** 7/17/2019 7:06:09 PM  
**To:** OConnor, Karina [OConnor.Karina@epa.gov]  
**CC:** Melgoza, Elizabeth@ARB [elizabeth.melgoza@arb.ca.gov]; Tasat, Webster@ARB [webster.tasat@arb.ca.gov]  
**Subject:** RE: Imperial PM2.5 Budget Questions  
**Attachments:** IMP\_Road\_Dust\_Emission\_Control\_17JUL2019.xlsx

Hello Karina,

Please see our response (in red) to your questions on Imperial PM2.5 budgets:

*First, the Imperial plan (section 6.4.5) indicates that the budget emissions reflect reductions from Regional dust controls, specifically Rules 800, 803, 804 and 805. Do you know what level of reductions were claimed from these rules and how they were applied?*

The summary table in the attached spreadsheet shows the emission reductions taken in the EI before and after 2012. Reductions from Rules 803, 804, 805, and 806 were accounted for in 2006 but reductions were only taken for Rule 805 post 2012 (for 2019 and 2022). I believe Rule 800 was included in the text above since this regulation does include requirements for dust control plans for OHV areas, which would produce emission reductions (but these reductions were not quantified or accounted for in the SIP/budgets).

Section 3.10.10 indicates that reductions from Rules 803 and 805 were included in the paved road dust emissions but doesn't explain how. Section 3.10.12 indicates that reductions for rule 805 were used in the unpaved nonfarm road dust emissions.

Paved road dust emissions would only be accounted for in Rules 803 and 805. Reductions from Rule 803 were only taken in 2006. Rule 805 reductions were taken for 2006, 2019, and 2022. The paved road dust categories in CEPAM contain freeways, major streets, collector streets, and local streets and hence Rules 803 and 805 is applied to this budget.

There is no other mention of rules 800 or 804 in the plan except in Table 3-5, which references Rule 804 as applying to windblown dust from Open Areas (? Unpaved parking lots?) .

Rule 804 applies to any open area having 0.5 acres or more within urban areas, or 3.0 acres or more within rural areas; and contains at least 1000 square feet of disturbed surface area- Yes an unpaved parking lot could be subject to this rule.

Rule 800 is General Requirements for Control of PM10. Rule 803 as a rule applies to paved roads and reducing emissions from Carry and Track-out. Rule 805 applies to paved and unpaved non-farm roads.

Yes, you're right. Please refer attached table.

In addition to referencing the reduction in our notice, SCAG will need to know how to adjust paved and unpaved emissions for these rules once they need to show conformity to these budgets. Any assistance would be appreciated!

We will share the attached spreadsheet to SCAG staff to reflect in their conformity budget demonstration.

Please let me or Lizzy know if you have any follow up questions.

Thanks,

Nesamani

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**From:** OConnor, Karina <OConnor.Karina@epa.gov>  
**Sent:** Wednesday, July 10, 2019 1:29 PM  
**To:** Kalandiyur, Nesamani@ARB <nesamani.kalandiyur@arb.ca.gov>  
**Subject:** Imperial PM2.5 Budget Questions

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Nesamani – I have a couple of questions regarding the budgets for Imperial PM2.5 – plan attached.

First, the Imperial plan (section 6.4.5) indicates that the budget emissions reflect reductions from Regional dust controls, specifically Rules 800, 803, 804 and 805. Do you know what level of reductions were claimed from these rules and how they were applied?

Section 3.10.10 indicates that reductions from Rules 803 and 805 were included in the paved road dust emissions but doesn't explain how. Section 3.10.12 indicates that reductions for rule 805 were used in the unpaved nonfarm road dust emissions.

There is no other mention of rules 800 or 804 in the plan except in Table 3-5, which references Rule 804 as applying to windblown dust from Open Areas (? Unpaved parking lots?) . Rule 800 is General Requirements for Control of PM10. Rule 803 as a rule applies to paved roads and reducing emissions from Carry and Track-out. Rule 805 applies to paved and unpaved non-farm roads.

In addition to referencing the reduction in our notice, SCAG will need to know how to adjust paved and unpaved emissions for these rules once they need to show conformity to these budgets. Any assistance would be appreciated!

Thanks, Karina

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